

Application No.: 09/517952

Docket No.: MWS-037RCE2

**REMARKS**

Applicants cancel claims 1-2, 4-20, 22-36, and 38-53 and present new claims 54-68. No new matter is added. Support for the new claims can be found throughout the specification and at least at page 3, lines 1-16, page 4, lines 26-30, page 5, lines 18-31, page 6, lines 25-29, and page 7, lines 3-20. No new matter is added. Hence, upon entry of this amendment, claims 54-68 are pending, of which claims 54, 67, and 68 are independent. Applicants respectfully submit that the pending claims define over the art of record.

**The Claimed Invention**

The pending claims have been replaced by new claims in the present application to focus on especially novel aspects of the present invention and to expedite prosecution of the present application. The claims have been amended to recite in the independent claims that the report generator issues commands to a technical computing environment, wherein one of the commands instructs the technical computing environment to simulate a model. The commands may also, for example, modify the model by adding or removing a functional block and changing a parameter or initial condition of the model. The report generator uses a programming language of the technical computing environment to issue the commands. In response to the commands, the technical computing environment provides data to the report generator and reports are generated incorporating the data.

**Claim Objections and Claim Rejections**

Claims 19-34 are objected to due to minor informalities. Claims 1-2, 4-9, 11-20, 22-27, 29-36, 38-43, and 45-53 are rejected under 35 U.S.C. §103(a) as being unpatentable over "A Knowledge Based Electronic Information and Documentation System", ACM, 2000 by Young et al. (hereafter "Young") in view of "SGML nets: Integrating Document and Workflow Modeling", IEEE, 1998 by Weitz (hereafter "Weitz") further in view of United States Patent No. 6,101,489 to Lannert et al. (hereafter "Lannert"). Claims 10, 28, and 44 are rejected under 35 U.S.C. §103(a) as being unpatentable over Young in view of Weitz, and further in view of Lannert and "A Prototype Notebook-Based Environment for Computational Tools", IEEE 1998

Application No.: 09/517952

Docket No.: MWS-037RCE2

by Skidmore et al. (hereafter "Skidmore"). Applicants cancel claims 1-2, 4-20, 22-36, and 38-53 and hence the objections and rejections are moot.

#### New Claims

New claims 54-68 are added, of which claims 54, 67, and 68 are independent. The claimed invention is directed to a report generator controlling a simulation of a model and generating a report on the simulation results. Applicants respectfully submit that any combination of Young, Weitz, Lannert, and Skidmore do not teach or suggest the claimed invention.

The Young reference teaches that reports are generated from the instances created by a run of the system. The Young reference teaches a knowledge based documentation and information system called SciNapse, which transforms high-level simulation specification into code. See page 280, right column, first paragraph. The reports document the transformations the input specification underwent in becoming code. See Abstract, lines 15-18. In short, the Young reference teaches how to generate a report that documents code generation. In contrast, the claimed invention teaches how to use a report generator to control a simulation of a model. Specifically, independent claims 54, 67, and 68 recite that *commands are issued by the report generator to a technical computing environment using a programming language provided by the technical computing environment*, wherein one of the commands instructs the technical computing environment to simulate the model. Hence, Applicants respectfully submit that the Young reference teaches away from the claimed invention.

The Weitz reference teaches how to use SGML nets for managing business documents, whereas the claimed invention teaches how to use a report generator to control a simulation of a model in a technical computing environment by issuing commands to the technical computing environment using a programming language provided by the technical computing environment. Hence, the Weitz reference also teaches away from the claimed invention. Applicants respectfully submit that the relationship between the teachings of SGML nets for managing business documents and teachings of code generation documentation is not clear. Hence, one of ordinary skill in the art will not be motivated to combine the teachings of the Young reference and the Weitz reference.

Application No.: 09/517952

Docket No.: MWS-037RCE2

The Lannert reference teaches a goal based learning system where a user navigates through the learning system and experiences real world consequences for their actions and business decisions in a simulated real-world environment. Reports are generated to document user inputs so that a computer tutor can analyze all the mistakes a student made and tries to identify what misunderstanding would account for these mistakes. The learning system utilizes a *rule based system* to decide what kind of feedback the users will get based on their inputs to the system. Spreadsheets can be used to analyze data and show trends of a user. In contrast to the claimed invention, Lannert's teaching is directed to an educational simulation environment whereas the claimed invention is directed to a technical computing environment. Additionally, Lannert teaches that a *ruled based system* is used to determine how the learning system is navigated whereas the claimed invention teaches a report generator using a programming language of a technical computing environment to issue commands to the technical computing environment. Lannert does not teach any particulars of the command, such as an instruction to simulate a model, or to modify the model by adding or removing a functional block. In Lannert, the user inputs do not modify the business simulation model; they merely change the outcome of the system, rather than modifying the business simulation model. There is no motivation for the Lannert reference to allow user inputs to modify the business simulation model as that would disable Lannert to analyze how users would perform in the real business world and hence defeat the purpose of the teachings of Lannert. The claimed invention further teaches a report is generated incorporating data provided by the technical computing environment in response to the commands issued by the report generator. In contrast, Lannert teaches that report are generated based on user inputs where the user inputs are not in response to commands issued by a report generator but are rather in response to specific simulated business environment or situation that the user is in. Hence, Applicants respectfully submit that Lannert teaches away from the claimed invention.

Additionally, there is no relationship between the teachings of Lannert and the teachings of Young. One of ordinary skill in the art will not be motivated to modify the educational learning system of Lannert to generate a report that documents code generation of the business simulation model because Lannert is interested in analyzing a user's ability in business decision making and knowing how code is generated does not assist Lannert in achieving the purpose and

Application No.: 09/517952

Docket No.: MWS-037RCE2

goal of its teachings. Applicants respectfully submit that there is no suggestion to combine the teachings of the Lannert reference with the teachings of the Young reference.

The Skidmore reference teaches a system and a method for providing support for collaboration and other scientific activities across distributed computing platforms. The Skidmore reference is unrelated to the reporting of simulation results of a model. Hence, the Skidmore reference teaches away from the claimed invention.

Applicants respectfully submit that even when the teachings of the Young reference, the Weitz reference, the Lannert reference, and the Skidmore reference are combined, the combination does not render the pending claims obvious. The combination would merely teaches that reports can be generated from the business learning system, where one of the reports can be a report that documents code generation of the business simulation model in the learning system, as taught or suggested by the teachings of Young. Other reports can be the analysis of the user's performance in the simulated business environment, as taught or suggested by Lannert. All the reports that are generated can potentially be managed using the SGML nets as taught or suggested by Weitz. Additionally, all the reports can be shared to allow collaboration of information across distributed computing platforms, as taught or suggested by Skidmore. However, the combination of these references do not teach or suggest that a report generator issues commands to a technical computing environment using a programming language provided by the technical programming environment, wherein one of the commands instructs the technical computing environment to simulate a model and the report generator receives data from the technical computing environment in response to the commands, as recited in independent claims 54, 67, and 68.

Hence, Applicants respectfully submit that the combination of the Young reference, the Weitz reference, the Lannert reference, and the Skidmore reference do not teach or suggest each and every element and limitation of the pending claims. Accordingly, Applicants respectfully submit that the claimed invention define over the art of record.

Application No.: 09/517952

Docket No.: MWS-037RCE2

**CONCLUSION**

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants submit herewith a petition for one month extension of time. Applicants believe no other fee is due with this statement. However, if additional fee is due, please charge our Deposit Account No. 12-0080, under Order No. MWS-037RCE2 from which the undersigned is authorized to draw.

Dated: March 2, 2006

Respectfully submitted,

By 

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